

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

CITY OF ROSEVILLE EMPLOYEES' )  
RETIREMENT SYSTEM, ON BEHALF OF ) Civil Action No. 1:10-CV-10593-PBS  
HERSELF AND ALL OTHERS SIMILARLY )  
SITUATED, )  
Plaintiff, )  
-v- )  
BOSTON SCIENTIFIC CORPORATION, J. )  
RAYMOND ELLIOTT, JAMES R. TOBIN, and )  
SAMUEL R. LENO, )  
Defendants. )

**RESPONSE BY IRON WORKERS LOCALS 40, 361, 417 UNION  
SECURITY FUNDS FOR APPOINTMENT AS LEAD PLAINTIFF  
AND APPROVAL OF ITS SELECTION OF LEAD COUNSEL**

Based on the pending motions for appointment as lead plaintiff, it appears that there are other movants with larger losses than the loss of \$189,457 asserted by Iron Workers Locals 40, 361, 417 Union Security Funds (“Iron Workers Locals 40”). However, should the need arise, Iron Workers Locals 40 remains ready, willing, and able to assume the duties as lead or co-lead plaintiff and/or as class representative on behalf of the Class.

Dated: June 22, 2010

Respectfully submitted,

**GILMAN AND PASTOR LLP**

/s/ David Pastor

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**Attorneys for Iron Workers Locals 40, 361, 417  
Union Security Funds**

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on June 22, 2010.

/s/ David Pastor  
David Pastor